POTW PRETREATMENT PROGRAM AUDIT

Audit Date(s)	POTW Name
June 4 - 5, 2008	Municipal Sanitary Authority of the City of New Kensington

Contact Name	Title	Telephone
Joseph Ditty	Pretreatment Coordinator	724-335-9813
Address	120 Logans Ferry Road New Kensington, PA 15068-2046	

	Yes	No
Should this be the person on the mailing list?	X	

Participants				
	Name	Title	Organization	Telephone
1	John Lovell	Pretreatment Coordinator	EPA	215-814-5790
2	Joseph Ditty	Pretreatment Coordinator	MSANK	724-335-9813

NOTE: For Sections I through VIII, complete background sections based on information in pretreatment files and all other sections based on discussion with POTW personnel.

SECTION I: GENERAL INFORMATION

A. Background - Complete prior to onsite activity

1	Date of last annual report:	March 30.2008
	List unresolved issues.	· sludge priority pollutant scan missing · effluent exceedance for TSS (see Section III.A.16(b)) · sludge exceedances for nickel, zinc, and selenium (see Section III.A.16(c)) · some SNC during 2007, but users appear to have increased their compliance rates.
2	Date of last audit:	September 17, 2003
	List unresolved issues.	None
3	Date of last field audit:	November 17, 2004
	List unresolved issues.	None
4	Has the POTW submitted program modifications to address required streamlining revisions? If yes, list status.	Program revisions have been determined to be acceptable. Legal Authority revisions have been adopted the Authority, the City of Arnold, Plum Borough, and the City of New Kensington; still awaiting adopted ordinance from Lower Burrell.
5	Number of treatment plants:	1

NPDES Number	Issuance Date	Expiration Date
PA0027111	November 21, 2002	November 21, 2007

5 a. Measures of Success - Compliance with NPDES toxics limits (measure 5)

Year	Category 1	Category 2	Category 3
2007	No violations reported		
2006	No violations reported		
2005	No violations reported		
2004	No violations reported		
2003	No violations reported		

b. Measures of Success - Compliance with other NPDES limits (measure 6)

Year	Category 1	Category 2	Category 3

2007	No violations reported	
2006	TSS (1)	
2005	TSS (2), CBOD (1)	
2004		TSS (1/2)
2003	TSS (1)	

c. Measures of Success - Compliance with sludge limits (measure 7)

Year	Category 1	Category 2	Category 3
2007	No violations reported		
2006	No violations reported		
2005	No violations reported		
2004	No violations reported		
2003	No violations reported		

6	Any effluent or sludge violations in the past 12 months?	Yes	No	
		X		

Parameter violated	Date(s)	Reported Cause(s)
TSS	3/08	Loading violation due to high flow
$CBOD_5$	3/08	Loading violation due to high flow

7	Does the permit(s) require pretreatment implementation?	Yes	No	
		X		
8	Does the permit(s) have a schedule for pretreatment program implementation/modification?	Yes	No	
		X		

Activity	Milestone Date	Completion Date
Submit sampling plan and list of pollutants for local limits evaluation	February 21, 2003	October 27, 2003
Submit local limits reevaluation	November 21, 2003	July 30, 2004
Adopt revised local limits	November 21, 2005	November 21, 2005

9	List any pending program modifications and current status (verify during onsite activity).	Streamlining revisions are currently being adopted by the contributing municipalities (see item #4 above).

SECTION II: LEGAL AUTHORITY

A. Background - Complete prior to onsite activity

1 List all municipalities served by the POTW and applicable legal authorities (verify during onsite activity).

Municipality Name	Ordinance Date	Agreement Date	Any IUs? (X all that apply)		
			SIUs	IUs	None
Municipal Sanitary Authority of the City of New Kensington	4/5/94	N/A	X	X	
Arnold City	9/10/96	7/22/94	X	X	
Lower Burrell City	12/12/94	1/20/95		X	
New Kensington City	9/10/96	4/14/94	X	X	
Plum Borough	7/2/84	12/13/94			X

2 Was a legal authority review previously conducted?

Yes	No	Date	Reviewer
X		11/15/93	EPA

Describe any inadequacies not yet corrected. Plum Borough ordinance in the file is from before 1994 amendments to the Authority's regulations.

3 Has the POTW submitted legal authority revisions based on the streamlining amendments?

Yes	No
X	

If no, attach ordinance review. If yes, list status. Revisions acceptable and in the process of being adopted (see section I.A.4)

4 Does the POTW's ordinance provide for variances and/or special agreements?

Yes	No
	X[1]

If yes, does it:

	Yes	No	N/A
specifically prohibit changes to both categorical standards and other federal pretreatment requirements (e.g., reporting)?			X
establish a cap based on the current MAIL for revised local limits?			X
require that the revised limit or requirement be granted in writing?			X

B. Current

1	Update POTW's progress on correcting deficiencies, including streamlining.	The Authority's solicitor recently sent request to Lower Burrell for adoption of streamlining ordinance.

[1]Limits include a short-term pH excursion provision that is equivalent to 40 CFR 401.17, but does not allow any pH discharges below 5.0 S.U. or above 12.5 S.U.

2	Does the POTW intend to adopt any additional optional streamlining provisions?	No intent at this time.	
3	When did the POTW last review its ordinance to ensure that it is consistent with the POTW's current program implementation?	The Authority annually checks the regulations to determine if any revisions need to be made.	
4	Do any outside agencies implement all or part of the pretreatment program within the POTW's service area?		No
			X

SECTION III: APPLICATION OF STANDARDS				
A. Background - Complete prior to onsite activity				
1	Has the POTW stated in any annual reports since the last audit that problems (e.g., inhibition/upset, pass through, sludge contamination, corrosion, toxic fumes, etc.) have been caused by IU discharges?			
			X[2]	
2	a. Date of last local limits submission:	July 30, 2004		
	b. Date of acceptance:	July 21, 2005		
	c. Date of approval:	March 20, 2006		
3	Are the approved local limits allocated in the submission or left to be allocated in the permits?	Submission - uniform concentration		
4	Does the POTW have any BMPs approved as part of its local limits?			
			X	
5	Did the POTW include loadings from waste haulers in its local limit development?			
			X[3]	
6	Has the POTW received approval for removal credits?			
			X	
7	Has the POTW revised its approved program to establish the classification of nonsignificant categorical industrial users?			
			X	

[2]Although sludge monitoring shows that several pollutants exceed the exceptional quality standards for land application; the Authority does not land apply its sludge.

[3]Files indicate that the Authority did not receive hauled waste at that time. Current annual report indicates that the Authority only accepts occasional discharge from recreational vehicles.

8	Has the POTW revised its approved program to establish the classification of middle tier categorical industrial users?			
			X	
9	Has the POTW revised its approved program to provide for equivalent mass limits <u>in place of</u> concentration based categorical standards?			
			X	
10	Has the POTW revised its approved program to provide for equivalent concentration limits <u>in place of</u> mass based categorical standards?			
			X	

11	List all CIUs subject to production-based standards (with category):	None
12	List all CIUs subject to OCPSF, Petroleum Refining, or Pesticide Chemicals (with category):	None
13	List all CIUs for which mass-based limits were applied <u>in place of</u> concentration-based standards	None
14	List all CIUs for which a pollutants not present waiver has been granted:	None

15	Does the approved program include procedures for acceptance of hauled waste?			
			X	

16 a. Measures of Success - Influent (measure 1)

Year	Category 1	Category 2	Category 3
2007	As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Se, Ag, Zn, Cr^{+6}, Phenols(T), $CBOD_5$, TSS		
2006	As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Se, Ag, Zn, Cr^{+6}, Phenols(T), CBOD, TSS		
2005	As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Se, Ag, Zn, Cr^{+6}, Phenols(T), CBOD, TSS		
2004	As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Ag, Zn, Cr^{+6}, CBOD, TSS		
2003	As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Ag, Zn, Cr^{+6}, CBOD	TSS (1/4)	

b. Measures of Success - Effluent (measure 2)

Year	Category 1	Category 2	Category 3

2007	As, Cd, Cu, CN, Pb, Hg, Ni, Se, Ag, Zn, Cr^{+6}, Phenols (T), $CBOD_5$	TSS (1/4)	
2006	As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Se, Ag, Zn, Cr^{+6}, Phenols(T), CBOD, TSS		
2005	As, Cd, Cu, CN, Pb, Hg, Ni, Se, Ag, Zn, Cr^{+6}, Phenols(T), CBOD	TSS (1/4)	
2004	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, Cr^{+6}, CBOD, TSS		CN (4/4)[4] only 3 of 4 required Hg results submitted
2003	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, Cr^{+6}, CBOD		CN (4/4)[5], only 3 of required 4 Hg samples submitted

c. Measures of Success - Sludge (measure 3)

Year	Category 1	Category 2	Category 3
2007	As, Cd, Cu, Pb, Hg, Ni, Se, Zn	Se (1/4), Zn (2/4)	Ni (4/4), no priority pollutant scan
2006	As, Cd, Cu, Pb, Hg, Se, PCB	Ni (2/4), Zn (3/4)	
2005	As, Cd, Cu, Pb, Hg, Se, PCB	Ni (1/4), Zn (3/4)	
2004	As, Cd, Cu, Pb, Hg, Ni, Se, Zn, PCB		
2003	As, Cd, Cu, Pb, Hg, Ni, Se, Zn		

d. Measures of Success - Data/Local Limits (measure 4)

Year	Category 1	Category 2	Category 3
2007	As, Cd, Cr, Cu, CN, Pb, Hg, Ag, Cr^{+6}, Phenols(T), $CBOD_5$	missing data	Ni, Se, Zn, TSS
2006	As, Cd, Cr, Cu, CN, Pb, Hg, Se, Ag, Cr^{+6}, Phenols(T), CBOD, TSS		Ni, Zn
2005	As, Cd, Cr, Cu, CN, Pb, Hg, Se, Ag, Cr^{+6}, Phenols(T),		Ni, Zn, TSS

[4]2 exceedances reported as non-detectable, but with a detection level above the MAHC.

[5]1 exceedance reported as non-detectable, but with a detection level above the MAHC.

	CBOD	
B. Industrial User Characterization		
1	When was the last IWS completed?	Formal survey not completed in recent past; survey is updated on an ongoing basis.
2	How does the POTW locate new IUs?	Use of yellow pages, notification of new businesses from ordinance officers, requests to the Authority for new sewer connections.
3	How does the POTW investigate changes at existing IUs (e.g.,non-SIU to SIU, NSIU to CIU)?	A basic questionnaire is sent to users whenever there is a suspicion of change (e.g., discharge problem or other information received). Inspections are conducted as needed based on updated information.
4	How are changes discovered in contributing jurisdictions?	Same procedures used throughout the service area regardless of municipality.
5	Does the POTW maintain a list of non-SIUs?	No X as changes occur

C. Local Limits					
1	Is the POTW aware of instances of pass through, treatment plant inhibition/upset, sludge contamination, or other problems (excessive corrosion, toxic fumes, sewer blockages, etc.) during the past year, including problems caused by conventional wastes?				
			X		
2	Is the POTW aware of any instances where workers have experienced industrial waste-related injuries or illnesses?				
			X		
3	If the POTW allocates local limits through the permits, do they have a mechanism to track the allocations?				
					X
4	Has the POTW encountered any problems implementing applicable BMPs?				
					X
5	What has the POTW done to address category 2 or 3 ratings (most recent year) for influent, effluent, and sludge?	Sampling at Keystone has been increased to collect additional data to try to address the sludge exceedances for metals.			

D. Standards and Requirements for IUs					
1	Does the POTW report any questions/problems in the categorization of IUs?				
			X		
	If yes, describe.	The Authority still needs to finalize the combined wastestream formula application for Keystone, including calculating monthly average limits based on the 4-day average limits in the			

		electroplating regulations and the monthly average limitations in the metal finishing regulations.			
2	List all IUs where the combined wastestream formula was applied.	Revised limits based on the combined wastestream formula were drafted for Keystone in 2006 but never applied in the permit.			
3	Does the POTW have a list of new source dates for all categorical industries?		X[6]		
4	Has the POTW made a specific evaluation of process construction dates in relation to the new source date of any applicable categorical standards?		X		
5	List all IUs currently regulated under Pretreatment Standards for New Sources.	Keystone Rustproofing			
6	If present[7], does the POTW regulate CIUs for which a no discharge standard exists?	N/A - Authority not aware of any users subject to a no discharge standard.			
7	Has the POTW applied equivalent concentration limits to any users in the OCPSF, Petroleum Refining, or Pesticide Chemicals categories <u>in place of</u> mass limits?				X
8	Has the POTW applied equivalent mass limits to any users subject to concentration-based standards <u>in place of</u> concentration limits, other than those listed in Section A.9?			X	
9	Has the POTW granted any net/gross variances?			X	
E. Hauled Wastes					
1	Does the POTW accept wastes by truck, rail or dedicated pipe? (If no, go to Section V)		X		
	What types of waste are accepted?	Occasionally accept wastes from a recreational vehicle, but no other type of vehicle.			
2	Are any hauled wastes hazardous?			X	
	If no, how does the POTW confirm this?	Assumed based on type of vehicle making the discharge.			

[6]Copy of new source dates provided during the audit.

[7]CIUs with standards requiring no discharge include: feedlots, inorganic chemicals manufacturing, fertilizer manufacturing, iron & steel manufacturing, nonferrous metals manufacturing, steam electric power generating, timber products, oil & gas extraction, paint formulating, ink formulating, pesticide chemicals, battery manufacturing, metal molding & casting, porcelain enameling, aluminum forming, and nonferrous metals forming & metal powders.

3	Has the POTW designated a specific discharge point(s) for the waste (403.5(b)(8))?				
			X		
	If yes, where?	At the headworks of the treatment plant.			
4	Does the POTW have a control mechanism for regulating the waste (403.8(f)(1)(iii))?				
				X	
5	Does the control mechanism include all applicable categorical and local standards (403.8(f)(2)(iii))?				
					X
6	Does the POTW sample/require sampling of hauled waste?				
				X	

SECTION IV: CONTROL MECHANISM							
A. Background - Complete prior to onsite activity							
1	Provide the # of IUs based on the most recent file information:	SNIUs	CIUs	MTCIUs	NSCIUs	Other	Total
		5	1	0	0	173	179
2	a. List all SIUs without control mechanisms or with expired control mechanisms (and the date of expiration).	All permits expired on December 31, 2007.[8]					
	b. Identify which of these users have administratively extended control mechanisms.	None					
3	According to the approved program, what type of control mechanism was intended to be used to regulate industrial discharges?	permits					
4	What industries does the approved program indicate will be regulated through this control mechanism?	SIUs[9]					
5	What is the maximum control mechanism duration indicated in the approved program?	≤5 years					
6	Has the POTW revised its approved program to allow for general control mechanisms?		No				
			X				
7	Does the annual report indicate that any users are covered by a general		No				

[8]Most recent annual report only covers the period ending December 31, 2007.

[9]Other users are required to have a permit except as authorized by the Authority.

	control mechanism?					X	
8	Measures of Success - Permit issuance rate (measure 15 - see attachment 1)						
B. Control Mechanism							
1	Give the current # of IUs:	SNIUs	CIUs	MTCIUs	NSCIUs	Other	Total
		5	1	0	0	172	178
2	Have all expired SIU control mechanisms been re-issued?						N/A
					X		
	Explain.	All permits reissued with an effective date of January 1, 2008.					
3	What type of control mechanism is currently being used?				permits		
4	Has the POTW issued any general control mechanisms other than those listed in Section A.7?					No	
						X	

SECTION V: COMPLIANCE MONITORING

A. Background - Complete prior to onsite activity

1	As required by the approved program, list the frequency for:	SNIU	CIU	MTCIU	NSCIU
	POTW sampling of IUs	2/year	2/year	N/A	N/A
	POTW inspection of IUs	1/year	1/year	N/A	N/A
	IU self-monitoring	2 - 26/year[10]	2 - 26/year[10]	N/A	N/A
	IU reporting	2/year	2/year	N/A	N/A
2	In the last year, indicate frequency of:	SNIU	CIU	MTCIU	NSCIU
	POTW sampling of IUs	2	5	N/A	N/A
	POTW inspection of IUs	1	1	N/A	N/A
	IU self-monitoring	4 - 52	6	N/A	N/A
	IU reporting	4 - 12	6	N/A	N/A
	If less than required by the approved program or less than 1/yr (403.8(f)(2)(v)), explain.	Based on the file review conducted during the audit, North Side Foods discharges 130,000 gpd of process waste and therefore would be required to conduct self-monitoring 26			

[10]Self-monitoring frequency in the approved program is based on user flow as follows: 0 - 10,000 gpd 2/year; 10,001 - 25,000 gpd 4/year; 25,001 - 50,000 gpd 6/year; 50,001 - 100,000 gpd 12/year; >100,000 gpd 26/year

		times per year.		
3	List all SIUs that were found to have been not sampled or not inspected in the last annual report.			
Name of IU		NS/NI/B[11]	Reason	
None				
4	Has the POTW revised its approved program to provide for waivers for pollutants not present?	Yes	No	
			X	
5	Has the POTW granted any monitoring waivers for pollutants not present?	Yes	No	
			X	
6	Measures of Success - Sampling and Inspection Coverage (measures 13 and 14 - see attachment 1)			
B. POTW Sampling and Inspection				
1	Update status of users listed in the table in A.3:			
Name of IU		NS/NI/B	Date planned/completed	
N/A				
2	Does the POTW conduct all of the sampling for any of its users?	Yes	No	
			X	
	If yes, does the POTW re-sample within 30 days of discovering a violation?		No	N/A
				X
3	For users with a monitoring waiver for pollutants not present, how often does the POTW monitor for the waived pollutants?	N/A		
4	Does the POTW have written standard operating procedures for sampling industrial users?	Yes	No	
			X[12]	
5	Does the POTW collect its own samples, or are they collected by a contractor?	Authority collects the samples.		
6	Are pH, oil & grease, cyanide, volatile organics, total phenol, sulfide, and hexavalent chromium collected by grab sample?		No	N/A
		X		
7	When collecting grab samples, how many grab samples are used?	The permits specify 4 grab samples for self-monitoring and the Authority generally attempts to collect 4 grab samples when it		

[11]NS = not sampled, NI = not inspected, B = both not sampled and not inspected.

[12]The Authority has documented the procedure for sampling at Unifirst because it is different than the procedure for the other users, but no written procedures exist for sampling in general.

		conducts sampling, but on average on 2 - 3 grabs samples are collected.		
	Has the POTW documented the reasons for the number of grab samples used?	No.		
8	Are composite samples used for all other pollutants to evaluate compliance with:	Yes	No	N/A
	Categorical standards?	X		
	Local limits?	X		
	Is any unannounced sampling conducted?		X[13]	
9	Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?	X		
10	How much time normally elapses between sample collection and obtaining analytical results?	2 - 3 weeks		
11	Has the POTW evaluated all of its users for the need for a slug control plan?	Yes	No	
		X		
12	Has the POTW documented and maintained the documentation of the slug control evaluations?	Yes	No	
		X		
13	What factors does the POTW consider in determining whether a user is required to develop a slug/spill control plan?	process waste variability; presence of batch discharges that vary from normal discharges		
14	Do the POTW's annual inspections include an evaluation of facility changes that might impact the need for a slug control plan?	Yes	No	
		X		
15	Does the POTW have procedures (e.g., identify waste, response personnel, identify key manholes, etc.) and equipment to investigate causes and sources of unknown slugs/spills to the POTW (including collection system)?	Yes	No	
		X		
	If yes, describe.	The Authority would start at the headworks of the plant with visual and other observations (including collecting a sample) and track the incident upstream to narrow down potential sources.		
C. IU Self-Monitoring and Reporting				
1	When are user self-monitoring reports due (e.g., 30 days after the monitoring period)?	28th of the month after the reporting period.		
2	How does the POTW verify that IUs report all sample	Review records of the user during the inspection to		

[13]The Authority generally provides about 24 hours notice.

	results if they sample more frequently than required?	see if any extra sampling data exists.		
3	Do any IUs discharge hazardous waste?	Yes	No	
			X	
	If no, how does POTW verify this?	Through the sampling and inspection of the users and an annual requirement that the users submit a statement regarding hazardous waste discharge.		
4	Does the POTW have procedures to monitor and control IUs when they close?	Yes	No	
			X	
	Describe.	Although the Authority is aware of the need to review users at the time that they close to prevent slug loads of wastes and unused raw materials. The Authority would also modify or revoke user permits in order to ensure that no unwanted materials are discharged to the sewer.		

SECTION VI: ENFORCEMENT

A. Background - Complete prior to onsite activity

1	Has the POTW revised its approved ERP based on the new SNC definition?		No	N/A
			X[14]	

2 Based on the most recent file data, list the SIUs in SNC (July through December 2007).

Name of IU	1st quarter of SNC	SNC params.	Describe enforcement taken with date	Scheduled compliance date
None				

3 Measures of Success - SNC rates (measures 8, 9, 10, 11 and 12 - see attachment 1)

B. Enforcement

1	When the POTW receives IU self-monitoring reports, how does it evaluate user compliance, including limits, completeness and timeliness of reports, and submission of resampling data?	Checklist used for the evaluation.
2	How often does the POTW evaluate for SNC?	Quarterly

[14]Definition of SNC not included in ERP. However, some responses to reporting violations use the 30-day reporting criteria to determine whether the violations are significant.

	Does the POTW document its SNC evaluation?	Yes, on SNC evaluation sheets		
	For what period was the last evaluation completed?	July through December 2007 (October 2007 through March 2008 has been started but not officially completed.		
	Is the POTW using the new SNC definition? If yes, describe which parts of the new definition are used.	Yes, but have not had anyone come close to being 45 days late on a report.		
3	Have there been instances where the POTW found the responses in its ERP to be inappropriate?		No	N/A
			X	
4	Has POTW taken enforcement against all instances of pass through/interference in the last year?		No	N/A
				X
5	Update based on most recent SNC period (July through December 2007)			

Name of IU	1st quarter of SNC	SNC params.	Describe enforcement taken with date	Scheduled compliance date
None				

SECTION VII: DATA MANAGEMENT AND PUBLIC PARTICIPATION				
A. Data Management				
1	Are all records maintained for at least 3 years?	Yes	No	
		X		
2	How does the POTW keep up-to-date on regulations and technical guidance for the pretreatment program?	seminars/conferences; EPA web site; periodic EPA mailings		
B. Public Participation				
1	Are records available to the public (403.14(c))?	Yes	No	
		X		
2	Have IUs requested that data be kept confidential?	Yes	No	
			X	
	If yes, what type of data was it, and how has the POTW handled it?	No data has been requested to be kept confidential to date, but if it did happen and the material was requested by the public, the Authority believes its first step would be to consult with the industry on whether the data could be released.		

SECTION VIII: PROGRAM RESOURCES		
1	Approximately how many person-years does the POTW devote to the pretreatment program?	1.1[15]
2	In what areas does the POTW need additional resources?	None - consultant available and may get some summer help.
3	What additional activities (if any) has the POTW undertaken to further the goals of the pretreatment program?	The Authority has permitted several different types of commercial users of concern such as restaurants, beauty salons, car washes and garages. It has also conducted outreach to public officials to increase awareness of and support for the program.
4	What has the POTW done to incorporate P2 practices into its pretreatment program?	The Authority passes information to the users when appropriate. For example, they introduced Keystone to the strategic goals program for metal finishers (they are now a silver level facility) and a silver recovery outfit.

[15]Pretreatment coordinator plus 10% of a secretary's time.

SECTION IX: INDUSTRIAL USER FILE EVALUATION			
IU Name	North Side Foods Corporation		
Category	N/A	PWF[16]	130,000 gpd[17]
Address	2200 Rivers Edge, Arnold, PA 15068-4542		
Comments	Process raw pork into pre-cooked sausage and bacon.		
IU Name	Keystone Rustproofing, Inc.		
Category	Metal finishing/electroplating	PWF	20,515 gpd[18]
Address	1901 Dr. Thomas Boulevard, Arnold, PA 15068		
Comments	Annodize, rack tin, and silver/tin on aluminum process lines are considered new sources (metal finishing), all other process lines are considered existing sources and part of a job shop (electroplating).		

[16]Process waste flow

[17]Based on 2005 questionnaire; process flow plus plant and equipment washdown; total water usage 159,590 gpd; permitted flow 110 gpm (158,400 gpd based on 24 hour day).

[18]Based on 2003 questionnaire; total water usage 20,800 gpd; no permitted flow.

NOTE: Complete all questions with a "Y" (yes), "N" (no), "N/A" (not applicable), "U" (unable to determine), or the appropriate number.

FILE REVIEW CHECKLIST	IU1	IU2
A1. Industrial User Characterization		
1. Is the IU categorical (CIU), non-significant categorical (NSCIU), middle-tier categorical (MTCIU), significant non-categorical (SNIU) or other (O)?	SNIU	CIU
2. Is the IU properly categorized?	Y	Y
A2. Non-Significant Categorical Industrial Users (complete only if the user is designated as an NSCIU)		
1. Has the user been designated as an NSCIU?	N	N
A3. Middle-Tier Categorical Industrial Users (complete only if the user is designated as a MTCIU)		
1. Has the user been designated as a MTCIU?	N	N
B1. Control Mechanism		
1. Does the file contain:		
• an updated control mechanism application and/or survey questionnaire?	N[19]	N[20]
• a current control mechanism?	Y[21]	Y[21]
• documentation[22] of how control mechanism limits and requirements were established?	Y[23]	Y[24]
2. Is the user regulated through an individual control mechanism (ICM) or general control mechanism (GCM)?	ICM	ICM

[19]2005 questionnaire; new questionnaire requested 6/2/08. However, the Authority's regulations require that a permit application be submitted 180 days prior to expiration of the current permit.

[20]2003 questionnaire; new questionnaire requested 6/2/08. However, the Authority's regulations require that a permit application be submitted 180 days prior to expiration of the current permit.

[21]Permit references Sections 3.0 - 6.0 from 2005 permit rather than listing these requirements in the current permit.

[22]Categorization, new source, combined wastestream formula, production based standards, monitoring frequency, comparison of local limits to categorical standards, etc.

[23]Although the documentation does not specifically state that the user is not subject to categorical standards, why some local limits are not included in the permit, why the frequency for sampling was chosen, or why four grab samples are required for pollutants where grab sampling is required.

[24]Although the documentation indicates that the user is subject to electroplating standards but not metal finishing, and does not indicate why some local limits are not included in the permit, why the frequency for sampling was chosen, or why four grab samples are required for pollutants where grab sampling is required.

FILE REVIEW CHECKLIST	IU1	IU2
3. Does the control mechanism include:		
• limits for all categorical and local limit pollutants?	N[25]	N[26]
• all applicable slug control requirements?	N[27]	N[27]
• all applicable BMP requirements?	N[28]	N[28]
• monitoring requirements for all categorical and local limit pollutants?	N[29]	N[29]
- if no, is there documentation of the reasons for excluding specific pollutants?	N	N
• sampling location and frequency?	Y[30]	Y[31]
• sample type, including appropriate use of grab and composite samples?	Y[32]	Y[32]
- if used, is there documentation on the use of time-proportional or grab samples in place of flow-proportional samples?	N[33]	N[33]
• legal authority cite?	Y[34]	
• issuance and expiration date?	Y	
• IU reporting requirements:		
- self-monitoring reports?	Y	
- notice of potential problems, incl. slugs?	Y	
- resampling requirement for self-monitoring?	Y	

[25]Limits not included for all local limit pollutants.

[26]Limits not included for all local limit pollutants, and no monthly average limits included for categorical pollutants.

[27]Permit includes generic slug control language, but does not incorporate the facility's slug/spill control plan.

[28]Permit includes generic BMP language, but does not include requirements for cleaning and maintaining flow and pH meters.

[29]Monitoring requirements not included for all local limit pollutants.

[30]Monitoring location specified as "at pretreatment facility".

[31]Monitoring location specified as "at sump inside building".

[32]Although requirement for composite samples does not specify whether it must be a flow or time proportioned composite.

[33]Permit does not specify whether time-proportional or flow proportional sampling is required.

[34]Includes general reference but does not cite specific legal authority.

FILE REVIEW CHECKLIST	IU1	IU2
- use of 136 methods?	Y	
- report more frequent monitoring?	Y	
- notification of changed discharge?	Y	
- notification of changes affecting slug potential?	Y[35]	
- if the user is an MTCIU, notification of changes causing it to no longer meet the MTCIU criteria?	N/A	N/A
- record-keeping requirements:		
☞ maintain for 3 years?	Y	
☞ sample date?	Y	
☞ sample time?	Y	
☞ sample location?	Y	
☞ sample type?	Y	
☞ name of sampler(s)?	Y	
☞ sample preservation?	Y	
☞ analyses dates?	Y	
☞ name(s) of analyst?	Y	
☞ analytical methods?	Y	
☞ analytical results?	Y	
- signatory requirement?	Y	
- certification statement for self-monitoring reports?	Y	
- compliance schedule?	N	N
☞ if yes, does it stay applicability of permit requirements?	N/A	N/A
- hazardous waste notification?	Y	
- right of entry?	Y	
- penalty provisions?	Y	
- nontransferability?	Y	
- revocation of permit?	Y	

[35]Requirement included in title of Section 2 of the permit addendum.

FILE REVIEW CHECKLIST	IU1	IU2
- representative sampling?	Y	
4. Is the permit effective for 5 years or less?	Y	Y
5. Were local limits and/or categorical standards properly applied?	N[36]	N[37]
6. If applicable, were production-based standards correctly applied?	N/A	N/A
7. If applicable, was the combined wastestream formula correctly applied?	N/A	N[38]
8. If applicable, were TTO requirements or alternatives correctly applied?	N/A	N[39]
9. Does the control mechanism include equivalent mass limits in place of concentration based categorical standards?	N/A	N
10. Does the control mechanism include equivalent concentration limits in place of mass based categorical standards?	N/A	N/A
11. Does the control mechanism include BMPs in place of local limits?	N	N
12. Does the control mechanism include a pollutants not present waiver?	N	N
13. In the inspector's opinion, is the sample frequency sufficient to determine compliance?	Y	Y
B2. General Control Mechanism (complete only if the user has been issued a general control mechanism)		
1. Is the user covered by a general control mechanism	N	N
B3. Equivalent Mass Limits (complete only if the user has been issued equivalent mass limits in place of concentration based categorical standards)		
1. Is the user regulated through equivalent mass limits in place of concentration based categorical standards?	N	N
B4. Equivalent Concentration Limits (complete only if the user has been issued equivalent concentration limits in place of mass based categorical standards)		
1. Is the user regulated through equivalent concentration limits in place of mass based	N	N

[36]Not all of the local limits were included in the permit.

[37]Not all of the local limits were included in the permit. In addition, no monthly average limits were included in the permit for pollutants regulated by the categorical standard and the chromium daily maximum limit in the permit is less stringent than the limit required based on the combined wastestream formula.

[38]12/8/06 spreadsheet shows 4800 gpd of metal finishing wastewater and 15,000 gpd of electroplating wastewater; calculated limits not applied in permit.

[39]Permit requires TTO monitoring at least once during the permit. If no TTOs are detected, then no additional monitoring for TTOs is needed as long as no TTOs are present on the site. If TTOs are present at the site but not detected in the effluent, the user must submit a TOMP and an annual certification.

FILE REVIEW CHECKLIST	IU1	IU2
categorical standards?		
B5. Pollutants Not Present (complete only is the user has been granted a monitoring waiver for pollutants not present)		
1. Has the user been granted a monitoring waiver for pollutants not present for any pollutants regulated by an applicable categorical standard?	N	N
C. POTW Inspections of IUs		
1. How many POTW inspections were conducted and documented in the last 12 months?	1	1
2. Does the inspection report include:		
• inspector name?	Y	
• inspection date/time?	Y	
• name of IU official contacted?	Y	
• evaluation of manufacturing facilities?	Y	
• evaluation of discharge of process baths or other chemicals?	Y	
• verification of production data if needed?	N/A	
• identification of wastewater sources, flow and types[40] of discharge?	Y	
• evaluation of pretreatment facilities?	Y	
• evaluation of chemical storage areas?	Y	
• evaluation of spill/slug control procedures?	Y	
• if applicable, evaluation of compliance with BMPs?	Y[41]	
• evaluation of general housekeeping?	Y	
• potential hazardous waste discharge?	Y	
• evaluation of self-monitoring equipment and techniques?	Y	
• evaluation of lab procedures?	N	
• evaluation of monitoring records?	Y	
D. POTW Sampling of IUs		
1. How many sampling visits were conducted and documented in the last 12 months?	2	3

[40]continuous, intermittent, batch, etc.

[41]Review of flow and pH meter calibration records.

FILE REVIEW CHECKLIST	IU1	IU2
2. Do the sampling reports include:		
• all analytical results?	Y	
• name of sampling personnel?	Y	
• sample date/time?	Y	
• sample type?	Y	
• sample location?	Y	
• wastewater flow during sampling?	N	
• sample preservation?	N[42]	
• chain of custody?	Y	
• analytical methods used?	Y	
• analysis date?	Y	
• name of analyst?	INIT	
3. Were all regulated parameters monitored?	Y	N[43]
4. Were 40 CFR 136 analytical methods used?	Y	Y
5. If POTW does not require self-monitoring, has the POTW resampled within 30 days after a violation?	N/A	N/A
E. IU Self-Monitoring and Reporting		
1. Has the IU submitted all required self-monitoring reports in the last 12 months?	Y	Y
2. Did the report include measured or estimated flow data?	Y	Y
3. Were all regulated parameters monitored at the required frequency?	Y	N[44]
4. If applicable, was information provided to determine compliance with applicable BMPs?	Y[45]	N
5. Is there documentation that the IU notified the POTW within 24 hours of becoming aware of a violation?	N/A	N

[42]Documentation includes a table showing the preservatives needed for each type of sample, but nothing showing that the sample collected met those specifications.

[43]No TTO analysis

[44]No TTO analysis provided.

[45]Records of pH meter calibration provided.

FILE REVIEW CHECKLIST	IU1	IU2
6. Has the IU resampled and reported within 30 days after a violation?	N/A	N
7. Are reports signed and certified by a responsible corporate official or authorized representative?	Y[46]	Y[47]
8. If applicable, was the authorization made in writing?	Y[48]	N/A
F. Slug/Spill Control		
1. Is there documentation in the file that the POTW conducted a slug evaluation?	Y	Y
2. If yes, does it include an inventory of process baths and other chemicals on site along with an evaluation of the potential for discharge of those baths and chemicals?	N[49]	Y
3. Have any slugs/spills been documented in the file?	Y[50]	N
4. If yes, did the user provide 24-hour notification?	U[51]	N/A
5. Was there a written report from the user addressing the slug/spill including:	U	N/A
• cause of the slug/spill?	U	N/A
• steps taken to minimize damage from the slug/spill?	U	N/A
• steps taken to ensure that the slug/spill does not recur?	U	N/A
6. Did the POTW require development of a slug/spill control plan?	Y	Y
7. Has the IU developed a slug/spill control plan?	Y	Y
8. Does the slug/spill plan contain:		
• description of discharge practices?	N[49]	Y[52]

[46]Reports signed by Michael Brown, Environmental and Safety Coordinator

[47]Reports signed by Paul Gunsallus, Vice President.

[48]Letter dated 7/9/03 from Gina Turoscy, Vice President of Manufacturing.

[49]Based on the plan it is unclear whether there are any process baths on site. Based on the facility visit conducted during the review, the only "process bath" that might be discharged is the caustic/water cleaner used to clean the cook line rollers.

[50]2004 incident where oil and grease was found in a pump station so the station and lines needed to be cleaned. Pump station now cleaned on a quarterly basis.

[51]2004 records not reviewed.

[52]Several baths are periodically discharged to treatment, but there is no discussion of any special handling of those baths. Based on discussions with the facility at the facility inspection conducted during the audit, the baths are metered into the treatment system in order to avoid over loading the treatment plant.

FILE REVIEW CHECKLIST	IU1	IU2
• description of stored chemicals?	Y	Y
• procedures to prevent slugs/spills?	Y	Y
• procedures to notify POTW of slugs/spills?	N[53]	Y
• follow-up practices to minimize damage from slugs/spills?	Y	Y
G. Enforcement		
1. Did the POTW respond to all IU violations in the last 12 months?	Y	Y
2. Was SNC status correctly reported on last AR?	Y	Y
3. Is the IU currently in SNC?	N	Y[54]
4. Is the IU under a formal enforcement action?	N	N
5. Did the POTW escalate action in accordance with the ERP?	N[55]	N[56]
H. Summary		
1. Is the file well organized and readily accessible?	Y	Y
2. Does the file indicate that the POTW has implemented only those streamlining options for which is has obtained approval?	Y[57]	Y

[53]The Authority is not on the notification list included in the plan. The plan noted that several floor drains and other containment areas flow to the treatment system and sewer.

[54]The failure to resample and report is considered a reporting violation. Based on the date of the signature on the report (December 28, 2007), the user would have been required to resample and report by January 27, 2008. At the time of the audit, the resample had not been submitted and was therefore more than 45 days late.

[55]The Authority did not respond with enforcement when the user failed to include CBOD testing in one of its weekly samples.

[56]The Authority did not respond with enforcement when the user failed to timely report resampling after a pH violation which occurred on March 18, 2008.

[57]It appears that none of the optional streamlining provisions have been implemented; POTW has not proposed any modifications of its pretreatment program to address these optional provisions.

SECTION X FINDINGS, REQUIREMENTS, AND RECOMMENDATIONS

A. Legal Authority

1. Findings on POTW's legal authority. **The legal authority had been previously reviewed and approved based on the 1988 and 1990 amendments to the pretreatment program. It appears that at the time of that approval, an updated ordinance from Plum Borough may not have been required (file includes an ordinance from 1984) because there are only residential users in the Borough and therefore none of the users would be subject to the ordinance requirements. The Authority's streamlining revisions have been reviewed and found to be acceptable. Adoption has occurred in all of the municipalities (including Plum Borough) except Lower Burrell.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- Ensure that the streamlining revisions to the legal authority are adopted by the City of Lower Burrell.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- Have the full pretreatment ordinance adopted by Plum Borough. Although there may be no current users in the Borough that are subject to the pretreatment program, having the ordinance in place will ensure that there is the ability to regulate any users that might locate there in the future, or any current users subject to the ordinance that may be unknown to the Authority and the Borough. In addition, since the streamlining ordinance revisions amended the Authority's regulations that had been revised in the 1990s, it is possible that the Borough ordinance has amended provisions that don't actually exist in its own ordinance.

B. Application of Standards

1. Findings on POTW's application of standards. **The Authority's procedures for becoming aware of new users in the system appears to be adequate, although the procedures for updating information on existing non-significant users appear sporadic. However, there is no indication that this has resulted in any problems in terms of how the users are regulated. The Authority has had fairly consistent exceedances of the exceptional quality sludge goals for nickel and zinc. Since the local limits were not developed based on the exceptional quality standards, this is not unexpected. The Authority does not land apply its sludge so these standards would be a goal and not a requirement. The Authority has not applied the correct categorical standards in the Keystone Rustproofing permit. North Side Foods discharges contaminated storm water to the combined sewer system in Arnold.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- Finalize the determination of the appropriate categorical standards for Keystone Rustproofing based on the combined wastestream formula and apply both the daily maximum and monthly average limits in the user's permit. Where daily maximum local limits are more stringent than the daily maximum categorical standards, the daily maximum local limit must be applied in place of the daily maximum categorical standard.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- Periodically review non-significant industrial users, through inspections, questionnaires, or other similar mechanisms, to ensure that the Authority becomes aware of changes at the facilities that would require changes in the way they are regulated (e.g., addition of processes subject to categorical standards, changes affecting the potential for a slug discharge).

- Review the potential impact of the storm water discharge from North Side Foods along with any plans for addressing combined sewer overflows in the area, and take steps to ensure that storm water discharges from North Side do not have an adverse impact on overflows.

C. Control Mechanism

1. Findings on the POTW's control mechanism. **Attachment 3 includes a review of the North Side Foods permit which is meant to provide a detailed evaluation of the Authority's control mechanism form. Although the permit form includes most of the elements needed in an effective permit, there are some changes that need to be made. The Authority has not required its users to submit permit applications as required by its regulations, and the permits that have been issued do not include all applicable categorical standards or local limits. The permits have also not required implementation of the users' slug control plans or required implementation of best management practices such as calibration of flow and pH meters.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- Revise the permits in accordance with the permit form review included in attachment 3. Items using the word "must" are required changes.

- Include appropriate limits in the Keystone permit based on local limits, categorical standards (electroplating and metal finishing), and the combined wastestream formula.
- Include all local limits in each significant user's permit.

- Require all significant users to reapply for permits at least 180 days prior to expiration of their permits as required by the Authority's regulations.

- Where time-proportional sampling (or grab sampling) is used in place of flow-proportional sampling, document the reasons why time-proportional sampling (or grab sampling) is considered representative of the discharge.

- Include all applicable slug control requirements in each significant user's permit, including the requirement to implement any slug/spill control plans that have been submitted by the user.

- Include all applicable best management practices in each significant user's permit, including requirements such as calibration of flow and pH meters.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- Revise the permits in accordance with the permit form review included in attachment 3. Items using the word "recommended" are recommended changes.

- More completely document the development of the user permit conditions, including whether the user is or is not subject to categorical standards and why, why monitoring is not required for some local limit pollutants, why the particular frequency for self-monitoring was chosen, and why the chosen number of grab samples is considered to be representative of the discharge. Attachment 4 includes guidance on permit documentation.

- More clearly specify the sampling location required for self-monitoring. The description of the sampling location should be clear enough that someone unfamiliar with the facility is able to locate it fairly easily. A diagram can often help show the exact location of the sample point.

D. Compliance Monitoring

1. Findings on POTW's compliance monitoring program. **In general, it appears that the monitoring program is adequate to accurately determine compliance and non-compliance by the users, although some adjustments are needed in order to completely comply with pretreatment requirements. The Authority generally requires that users collect four grab samples when grab samples are required. However, the Authority then only collects two or three grab samples for those pollutants when it samples. The Keystone permit requires at least one complete TTO scan, but the user does not appear to be submitting any TTO data. There is no documentation that Keystone provided the 24-hour noncompliance notification when it had violations or that it conducted resampling and reported within 30 days of becoming aware of the violation. The Keystone permit does not appear to specify a due date for self-monitoring reports, although the user appears to be reporting generally by the 28th of the month following the reporting period.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- In conducting monitoring at the users, use the sample monitoring type that is required of the users, including the same number of grab samples required of the users.

- Where TTO is regulated at a user (Keystone), require the user to report on all TTO compounds at least semiannually. If the user reports that some or all of the TTO compounds are not reasonably expected to be present and therefore does not monitor for those compounds, require a statement from the user indicating which compounds are not reasonably expected to be present and why.

- Ensure that Keystone has submitted a written evaluation of TTO compounds that are present at its facility before it skips monitoring of any TTO compounds because they are not reasonably expected to be present.

- Ensure that the user self-monitoring reports include all of the required monitoring data, including any required TTO monitoring.

- Ensure that users provide the 24-hour noncompliance notification and resampling and reporting within 30 days as required by 40 CFR 403.12(g)(2), and the Authority documents the 24-hour notification if it is made orally.

- Ensure that all permits specify a due date for the self-monitoring reports.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- Prepare written standard operating procedures for conducting monitoring at the users, including preparation of sampling equipment. Guidance on monitoring standard operating procedures is included in attachment 5.

- Conduct all monitoring at the users without prior notification. This can help ensure that the users do not change their operations in order to show compliance in the discharge.

- Develop procedures to monitor users when they close. This could include a requirement that the users provide prior notification of closure, a written closure plan from the user outlining how they will dispose of process baths and other wastes on the site, documentation by the user of proper disposal of all materials, and a pre-closure and post-closure inspection by the Authority.

- Include documentation in the file of the preservatives actually added to each sample rather than simply including a list of preservatives that should be added.

- Require that self-monitoring reports include documentation on the calibration of flow and pH meters where present.

- Require that the North Side Foods' slug/spill plan be revised to address the procedures used to dispose of the caustic/water cleaning bath used to clean the cook line rollers, and to provide notification to the Authority of any spills/slugs that might impact the sewer system.

- Require that the Keystone slug/spill plan be revised to detail procedures used to dispose of process baths located at the site whenever these baths are discharge to the on-site treatment system.

E. Enforcement

1. Findings on the POTW's enforcement. **The Authority is generally following its approved enforcement response plan for effluent violations at the users. However, it appears that the Authority is not always taking action where there are reporting violations. Although no revisions of ther enforcement response plan were required as part of the streamlining review because the definition of significant noncompliance is not included in the plan, some of the enforcement responses for reporting violations use the 30-day reporting criteria for determining if the violation is significant while the Authority's definition in its revised regulations uses 45 days.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- Ensure that enforcement occurs for all violations in accordance with the enforcement response plan.

- Revise the enforcement response plan so that it is consistent with the Authority's new definition of significant noncompliance.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- None.

F. Data Management and Public Participation

1. Findings on data management and public participation. **The Authority's files are well organized and requested materials could be easily found.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- None.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- None.

G. Resources

1. Findings on the POTW's resources. **There do not appear to be any issues related to a lack of resources.**

2. To comply with its approved program and/or the General Pretreatment Regulations, the POTW is required to do the following:

- None.

3. To improve its pretreatment program, it is recommended that the POTW do the following:

- Encourage additional pollution prevention at Keystone Rustproofing to reduce the levels of metals discharged to the sewer in order to reduce the levels of metals in the Authority's sludge.

Attachments

1 - Pretreatment Audit Measures Charts

2 - File Review Worksheets

3 - Permit Form Review

4 - Documentation of Permit Decisions

5 - Standard Operating Procedures for Sampling

6 - Updated Penalty Payment Status

7 - Industrial Inspection Reports
a - North Side Foods
b - Keystone Rustproofing

8 - Audit Action Items

Control Mechanism Worksheet

INDUSTRY NAME		**North Side Foods**					
PERMIT EFFECTIVE DATE		**January 1, 2008**		PERMIT EXPIRATION DATE		**December 31, 2008**	
		CATEGORICAL STANDARD		PERMIT LIMIT			
PARAMETER	LOCAL LIMITS (mg/l)	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	REQUIRED SAMPLE TYPE	REQUIRED SAMPLE FREQUENCY
$CBOD_5$	729				729	24-hr comp	1/week
TSS	771				771	24-hr comp	1/week
Ammonia	20.0						
Phosphorus	10.0						
Oil & Grease	100				500	grab[1]	1/week
pH (S.U.)	6.0 - 11.5[2]				6 - 11.5[3]	continuous	continuous
pH (S.U.)	6.0 - 11.5[2]				6 - 11.5[3]	grab[1]	1/week
Flow (gpm)					110	continuous	continuous
Temperature (°F)	150				150	grab[1]	1/week
Cyanide (T)	0.15						
Copper	1.4						

[1]4 grab samples required to be taken at least 1 hour apart.

[2]pH limits allow for short term exceedances where the user conducts continuous pH monitoring provided that at no time the pH falls below 5.0 S.U. or above 12.5 S.U.

[3]pH limit listed in the permit twice; both limits are the same.

INDUSTRY NAME		North Side Foods					
PERMIT EFFECTIVE DATE		**January 1, 2008**		PERMIT EXPIRATION DATE		**December 31, 2008**	
		CATEGORICAL STANDARD		PERMIT LIMIT		REQUIRED SAMPLE TYPE	REQUIRED SAMPLE FREQUENCY
PARAMETER	LOCAL LIMITS (mg/l)	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM		
Lead	2.31						
Zinc	3.0						
Chromium (T)	13.1						
Chromium (+6)	2.3						
Nickel	0.72						
Cadmium	0.20						
Mercury	0.019						
Arsenic	0.110						
Silver	0.56						
Phenolics (T)	1.0						
Selenium	14.1						

Sampling Worksheet

INDUSTRY NAME		**North Side Foods**			
CONTROL AUTHORITY MONITORING					
DATE SAMPLE COLLECTED	POLLUTANTS NOT SAMPLED	VIOLATIONS? (Y/N/PARAMETER)	DATE SAMPLE COLLECTED	POLLUTANTS NOT SAMPLED	VIOLATIONS? (Y/N/PARAMETER)
6/26-27/07	N/A	Y (CBOD)	11/29-30/07	N/A	N
INDUSTRIAL USER SELF-MONITORING					
IS THIS A RESAMPLE?	REPORT DUE DATE	REPORT RECEIVED	SAMPLE DATE(S)	POLLUTANTS NOT SAMPLED	VIOLATIONS? (Y/N/PARAMETER)
N	12/28/07	12/20/07	11/7, 11/15, 11/20, 11/28	N/A	N[4]
N	1/28/08	1/21/08	12/6, 12/14, 12/18, 12/27	Y (Failure to sample)[5]	N[4]
N	2/28/08	2/25/08	1/4, 1/8, 1/16, 1/24, 1/31	N/A	N[4]
N	3/28/08	3/26/08	2/5, 2/14, 2/22, 2/29	N/A	N[4]
N	4/28/08	4/28/08[6]	3/4, 3/11, 3/25, 3/28	N/A	N[4]
N	5/28/08	5/22/08	4/1, 4/9, 4/17, 4/25, 4/29	N/A	N[4]

[4]File review included only a spot check of the daily flow and pH meter charts that were submitted with the report; compliance determination for these pollutants relied mainly on the POTW's determination that there were no pH or flow violations.

[5]CBOD not reported for 12/18 sample because of lab equipment breakdown.

[6]Date report reviewed by POTW.

Enforcement Worksheet

INDUSTRY NAME		**North Side Foods**			
DATE OF VIOLATION	TYPE OF VIOLATION	TYPE OF ACTION AND DATE	ERP REQUIRED RESPONSE	IU RESPONSE DATE	DATE COMPLIANCE ACHIEVED
6/26/07	CBOD (851 mg/l)	NOV (7/26/07)	NOV[7]	8/22/07	7/5/07
12/18/07	Failure to sample CBOD	None	NOV with potential fine[8]		

[7]Enforcement response for isolated, not significant violation of permit limit with no harm to the POTW/environment.

[8]Enforcement response for failure to monitor all pollutants as required by permit.

Control Mechanism Worksheet

INDUSTRY NAME		**Keystone Rustproofing**					
PERMIT EFFECTIVE DATE		**January 1, 2008**		PERMIT EXPIRATION DATE		**December 31, 2008**	
		CATEGORICAL STANDARD		PERMIT LIMIT		REQUIRED SAMPLE TYPE	REQUIRED SAMPLE FREQUENCY
PARAMETER	LOCAL LIMITS	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM		
$CBOD_5$	729						
TSS	771						
Ammonia	20.0						
Phosphorus	10.0						
Oil & Grease	100						
pH (S.U.)	6.0 - 11.5[9]				6 - 11.5[10]	grab[11]	1/2 months
pH (S.U.)	6.0 - 11.5[9]				6 - 11.5[10]	continuous	continuous
Flow						continuous	continuous
Temperature (°F)	150						
Cyanide (T)	0.15	[12]	[12]		0.15	grab[13]	1/2 months

[9]pH limits allow for short term exceedances where the user conducts continuous pH monitoring provided that at no time the pH falls below 5.0 S.U. or above 12.5 S.U.

[10]pH limit listed in the permit twice; both limits are the same.

[11]Grab samples required to be taken at the end of the sampling period.

[12]For the cyanide limit, the metal finishing standards regulate process waste streams that contain cyanide. All other non-cyanide bearing process waste streams are considered dilution for determination of the cyanide limit. Therefore, in order to determine the correct categorical limit based on the combined

INDUSTRY NAME		**Keystone Rustproofing**					
PERMIT EFFECTIVE DATE		**January 1, 2008**		PERMIT EXPIRATION DATE		**December 31, 2008**	
		CATEGORICAL STANDARD		PERMIT LIMIT		REQUIRED SAMPLE TYPE	REQUIRED SAMPLE FREQUENCY
PARAMETER	LOCAL LIMITS	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM		
Copper	1.4	1.9	4.2		1.40	24-hr comp.	1/2 months
Lead	2.31	0.3	0.6		0.6	24-hr comp.	1/2 months
Zinc	3.0	1.7	3.8		3.00	24-hr comp.	1/2 months
Chromium (T)	13.1	2.3	6.0		**7.0**	24-hr comp.	1/2 months
Chromium (+6)	2.3						
Nickel	0.72	1.9	4.1		0.72	24-hr comp.	1/2 months
Cadmium	0.20	0.4	0.9		0.20	24-hr comp.	1/2 months
Mercury	0.019						
Arsenic	0.110						
Silver	0.56	[14]	[14]		0.56	24-hr comp.	1/2 months
Phenolics (T)	1.0						

wastestream formula, the total flow regulated under metal finishing must be further divided between cyanide bearing and non-cyanide bearing waste streams.

[13]Grab samples required to be taken at equal intervals (once every 8 hours) over the discharge period, and at least 1 hour apart.

[14]For the silver limit, the electroplating standards only establish a silver limit for process waste streams that are covered under precious metals plating. All other process waste streams covered under electroplating are considered "unregulated" for determination of the silver limit. Therefore, in order to determine the correct categorical limit based on the combined wastestream formula, the total flow regulated under electroplating must be further divided between precious metals and other waste streams.

INDUSTRY NAME		**Keystone Rustproofing**					
PERMIT EFFECTIVE DATE		**January 1, 2008**		PERMIT EXPIRATION DATE		**December 31, 2008**	
		CATEGORICAL STANDARD		PERMIT LIMIT		REQUIRED SAMPLE TYPE	REQUIRED SAMPLE FREQUENCY
PARAMETER	LOCAL LIMITS	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM		
Selenium	14.1						
Total Metals[15]		5.0	10.5		10.5	24-hr comp.	1/2 months
TTO			2.13		2.13	24-hr comp.	[16]

[15]Sum of results for copper, nickel, chromium, and zinc.

[16]Permit requires a minimum of annual testing. If no TTOs are detected, no additional monitoring is required as long as no TTOs are present on site. If TTOs are present on site, the user must submit a TOMP and annual certification.

Sampling Worksheet

INDUSTRY NAME		**Keystone Rustproofing**			
CONTROL AUTHORITY MONITORING					
DATE SAMPLE COLLECTED	POLLUTANTS NOT SAMPLED	VIOLATIONS? (Y/N/PARAMETER)	DATE SAMPLE COLLECTED	POLLUTANTS NOT SAMPLED	VIOLATIONS? (Y/N/PARAMETER)
4/27/07	TTO	N	6/27/07	TTO	N
9/6-7/07	[17]	N[18]	12/11-12/07	TTO	N
INDUSTRIAL USER SELF-MONITORING					
IS THIS A RESAMPLE?	REPORT DUE DATE	REPORT RECEIVED	SAMPLE DATE(S)	POLLUTANTS NOT SAMPLED	VIOLATIONS? (Y/N/PARAMETER)
N	[19]	2/27/07	1/25/07	TTO	N
N	[19]	4/27/07	3/30/07	TTO	N[20]
N	[19]	6/26/07	5/31/07	TTO	N
N	[19]	8/24/07	7/31/07	TTO	N
N	[19]	10/29/07	9/19/07	TTO	N
N	[19]	12/28/07	11/29/07	TTO	Y (CN)[21]
N	[19]	3/3/08	1/31/08	TTO	N

[17]The Authority collected 3 grab samples for cyanide; no other pollutants sampled.

[18]Results of <0.01mg/l and 0.217 mg/l on 9/6 and <0.01 mg/l on 9/7; average of samples is below limit.

[19]Permit does not specify a report due date.

[20]Nickel reported as 0.725 mg/l; limit is 0.72 mg/l.

[21]Lab report dated 12/27/07; report signed 12/28/07.

INDUSTRY NAME		Keystone Rustproofing			
N	[19]	4/29/08	3/26/08	TTO	Y (pH)

Enforcement Worksheet

INDUSTRY NAME		Keystone Rustproofing			
DATE OF VIOLATION	TYPE OF VIOLATION	TYPE OF ACTION AND DATE	ERP REQUIRED RESPONSE	IU RESPONSE DATE	DATE COMPLIANCE ACHIEVED
11/29/07	CN (0.214 mg/l)	NOV (2/18/08) $2000 proposed penalty[22]	NOV[23]	4/10/08[24]	1/31/08
3/18/08	pH (< 5.0 for 4 minutes)	NOV (5/28/08)	NOV[23]		3/18/08
4/17/08	Failure to resample and report for pH	None	NOV/AO[25]		4/29/08

[22]To be considered at the Authority's 5/19/08 meeting; no indication in the file regarding the outcome of the meeting.

[23]Enforcement response for isolated, not significant violation of permit limit with no harm to the POTW/environment.

[24]Upgrade of treatment system ($50,000); work to be completed by 4/16/08.

[25]Enforcement response required for failure to report; NOV required when report is less than 30 days late and AO required when report is more than 30 days late.